I have been a licensed Amateur Radio Operator for 48 years, getting my Novice in January 1955 and earning my Amateur Extra in 1977. I became a VE in 1984. Further, I worked in electronics for 20 years and am now a Professor Emeritus, having retired from a major community college district after twenty years. I am neither an engineer nor attorney, as many of the writers of petitions and comments seem to be. Still, this background gives me good insight into the level of knowledge needed to function on technical and communications planes.

I speak only for myself, not for any amateur related organizations that I belong to; nor do they speak for me.

My opinion of RM-10783 is that it should be denied since he brings no data to reinforce his statements and injects irrelevant comments, i.e.

What is the relevance of being a Life Member of the ARRL, and his operating modes; both past and present? Parenthetically, if he has held the call from the beginning, he was probably licensed in the early '50, which means he has a wealth of knowledge to draw from.

In paragraph 5 (corrected numbering), he conveniently omits the prerogative of individual administrations to maintain Morse.

His statement in 6 re ab initio is interesting and most likely true. I must ask then, what would the tests consist of and what would justify that content?

In 7, like anything else, the newcomer is aware of the needs, requirements and obligations of the issue at hand. This includes Morse today. Much as I would like to have been an airline pilot, I couldn't have passed the physical when I started to fly, so I knew there were limits.

In 8, I would refer the reader to the Handihams, who have literally done miracles in this area.

And in 9, Morse is still used (at 7 WPM [40% faster than Ham]) in aviation to identify navigation beacons, as they have since beacons were first used.

Therefore, I would not support this RM.

Thank you for reading and considering my view on this Rulemaking.

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